

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARIA THERESA NOBLE,

Plaintiff,  
-against-

MOUNT OLIVET CHURCH, INC., aka MOUNT  
OLIVERT CHURCH, INC., aka MOUNT OLIVER  
CHURCH INC., aka MOUNT OLIVE CHURCH INC.,  
and ARACELIS STAATZ, as Trustee of Mount Olivet  
Church,

Defendants.

MOUNT OLIVET CHURCH, INC. and ARACELIS  
STAATZ, as Trustee of Mount Olivet Church,

**18-CV-07871-NRB**

Third-Party Plaintiffs,

**NOTICE OF MOTION**

-against-

LEDWIN OVIEDO, LEDWIN ENTERPRISES, INC.,  
JAMIE RAMIREZ, ESQ. and LAURA C. BROWNE,  
ESQ.,

Third-Party Defendants.

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**PLEASE TAKE NOTICE** that, upon the annexed affirmation of Joseph L. Francoeur dated August 21, 2020 and the exhibits thereto, the accompanying memorandum of law, and all the prior pleadings and proceedings herein, third-party defendant, LAURA C. BROWNE, ESQ., will move this Court before the Hon. Naomi Reice Buchwald, U.S.D.J., at the Courthouse located at 500 Pearl Street, New York, New York 10007-1312, on a date to be set by the Court, for an Order, pursuant to Fed. R. Civ. P. 12(b)(6) and 9(b), dismissing the Amended Third-Party

Complaint for its failure to state claims upon which relief can be granted, and granting such other, further, and different relief as this Court deems just and proper.

Dated: New York, New York  
August 21, 2020

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

Joseph L. Francoeur

Joseph L. Francoeur  
Maxx M. Johnson  
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TO: All counsel of record via electronic filing.